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United States Courts  
Southern District of Texas  
FILED

*December 08, 2021*

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**V.**

**HERIBERTO LATIGO,  
MARIA D. LUCIO DE LATIGO, and  
QIJUN SONG,  
Defendants.**

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**CRIMINAL NO. 4:21-cr-575**

**CRIMINAL INDICTMENT**

THE GRAND JURY CHARGES THAT:

**COUNT ONE**  
**(Stalking)**


On or about April 1, 2018 through July 29, 2021, in the Southern District of Texas and elsewhere,

**HERIBERTO LATIGO,  
MARIA D. LUCIO DE LATIGO, and  
QIJUN SONG,**

the defendants, with the intent to injure, harass, intimidate, and place under surveillance with intent to injure, harass, and intimidate another person, did use the mail, an interactive computer service and electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to an intimate partner of that person, to wit: LATIGO, LUCIO DE LATIGO and SONG used interstate facilities, namely the mail and the Internet, to disseminate harassing and threatening messages/images regarding Victim-1, causing substantial emotional distress to Victim-1.

All in violation of Title 18, United States Code, Sections 2261A(2)(B) and 2.

A TRUE BILL:

  
GRAND JURY FOREPERSON

JENNIFER B. LOWERY  
Acting United States Attorney

By:

  
Sherri L. Zack

Assistant United States Attorney  
713-567-9374